

FILED
JAMES BONINI
CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

2012 OCT 18 PM 12:13
U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

UNITED STATES OF AMERICA

Case No. 2:12-CR-164

vs.

JUDGE MARBLEY

TODD L. SMITH

18 U.S.C. § 2422(b)
18 U.S.C. § 2251(a) & (e)

SUPERSEDING
INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

Coercion and Enticement of a Minor for Sexual Activity

From on or about, February 12, 2012, through and including on or about March 1, 2012, in the Southern District of Ohio, the defendant, TODD L. SMITH, did knowingly use a means or facility of interstate commerce, that is, the internet, to knowingly attempt to persuade, induce or entice a minor, Jane Doe A, to engage in sexual activity for which the defendant can be charged with a criminal offense.

In violation of 18 U.S.C. § 2422(b).

COUNT TWO

Attempted Production of Sexually Explicit Conduct of a Minor

On or about April 14, 2012, in the Southern District of Ohio, the defendant, TODD L. SMITH, did knowingly attempt to employ, use, persuade, induce, entice, or coerce a minor, Jane Doe A, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce, that is a cellular telephone, knowing and having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce, including by cellular telephone and the internet.

In violation of 18 U.S.C. § 2251(a) & (e).

COUNT THREE

Attempted Production of Sexually Explicit Conduct of a Minor

On or about May 14, 2012, in the Southern District of Ohio, the defendant, TODD L. SMITH, did knowingly attempt to employ, use, persuade, induce, entice, or coerce a minor, Jane Doe A, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce, that is a cellular telephone, knowing and having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce, including by cellular telephone and the internet.

In violation of 18 U.S.C. § 2251(a) & (e).

COUNT FOUR

Coercion and Enticement of a Minor for Sexual Activity

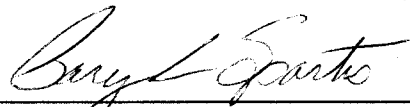
From on or about, May 1, 2012, through on or about and including July 25, 2012, in the Southern District of Ohio, the defendant, TODD L. SMITH, did knowingly use a means or facility of interstate commerce, that is, a cellular telephone and the internet, to knowingly attempt to persuade, induce or entice a minor, Jane Doe B, to engage in sexual activity for which the defendant can be charged with a criminal offense.

In violation of 18 U.S.C. § 2422(b).

A TRUE BILL.

s/Foreperson
FOREPERSON

CARTER M. STEWART
United States Attorney



GARY L. SPARTIS (0023428)
Columbus Branch Chief